

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

J.B. INTERNATIONAL, LLC d/b/a
J. BIRNBACH,

Plaintiff,

v.

WILLIAM NOBLE RARE JEWELS, L.P.,
and WILLIAM NOBLE,

Defendants.

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Civil Action No. 3:22-cv-01422

DEFENDANTS' INITIAL DISCLOSURES

Defendants William Noble Rare Jewels, L.P., (“*WNRJ*”) and William Noble (“*Noble*”) (collectively, “*Defendants*”), serve this, their Initial Disclosures, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

- (i) **The name, address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses.**

RESPONSE:

| Name | Brief Description |
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| <p>Employees, representatives, and/or agents of J.B. International, LLC d/b/a J. Birnbach, including, but not limited to:</p> <p>Jonathan Birnbach c/o KAMINSKI LAW, PLLC Shanna M. Kaminski MI Bar No. P74013 skaminski@kaminskilawpllc.com</p> <p>- And -</p> <p>PADFIELD & STOUT, LLP Mark W. Stout State Bar No. 24008096 mstout@padfieldstout.com Brandon J. Gibbons State Bar No. 24082516 bgibbons@padfieldstout.com 420 Throckmorton Street, Suite 1210</p> | <p>J.B. International is the plaintiff and has knowledge of relevant facts related to the allegations asserted against WNRJ and Noble.</p> |

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| Fort Worth, Texas 76102 Telephone: (817) 338-1616 Facsimile: (817) 338-1610 | |
| Employees, representatives, and/or agents of William Noble Rare Jewels, L.P., including, but not limited to: William Noble c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford State Bar No. 24059623 tcrawford@cw1.law Cameron E. Jean State Bar No. 24097883 cjean@cw1.law 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551 | WNRJ is a defendant and has knowledge of relevant facts related to the claims and defenses in this case. |
| William Noble c/o Crawford, Wishnew & Lang PLLC Trey Crawford State Bar No. 24059623 tcrawford@cw1.law Cameron E. Jean State Bar No. 24097883 cjean@cw1.law 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551 | Noble is a defendant and has knowledge of relevant facts related to the claims and defenses in this case. |
| Jeffrey A. Mitchell Address Unknown Phone Number Unknown | Mitchell has knowledge regarding the terms of the Letter Agreement. |

Defendants reserve the right to supplement this disclosure with names and addresses of additional individuals as they become known during the course of discovery.

- (ii) **A description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support their claims or defenses.**

RESPONSE:

Defendants have not yet determined all the documents, electronically stored information, and tangible things that it has in its possession, custody, or control, that they may use to support their claims or defenses. They have identified the following:

- Invoices and memorandums between the parties;

- Correspondence, including emails and text messages, between the Parties regarding the Letter Agreement;
- Correspondence, including emails and text messages, between the Parties regarding memorandums and invoices; and
- Receipts of payments made to J. Birnbach.

Defendants reserve the right to supplement this disclosure with additional discoverable documents as they become known during the course of discovery.

(iii) **A computation of each category of damages.**

RESPONSE: None at this time.

(iv) **Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE: N/A. Defendants reserve the right to supplement this disclosure with additional discoverable documents as they become known during the course of discovery.

Respectfully submitted,

/s/ Trey Crawford

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2023, a true and correct copy of the foregoing document was forwarded to all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Trey Crawford

Trey Crawford